Nicholas Inman State Bar No. 00787747 ALLMAND LAW FIRM, P.L.L.C. 860 Airport Freeway, Suite 401 Hurst, TX 76054 214.265.0123 Phone 214.265.1979 Fax

ATTORNEY FOR DEBTOR

IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

IN RE:

KIMBRA RENEE CURRIE	§	CASE NO. 18-42708
Debtor,	\$ \$ &	CHAPTER 13
CARVANA, LLC	<u> </u>	
Movant,	§	
	§	
VS.	§	
KIMBRA RENEE CURRIE	§	
	§	
Respondent.	§	

<u>DEBTOR'S UNOPPOSED RESPONSE TO MOTION FOR RELIEF FROM STAY</u> TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW **KIMBRA RENEE CURRIE**, Respondent in the above-styled and numbered cause and in response to the Motion for Relief from Stay of **Carvana**, **LLC** ("Movant") and in regard to the collateral referenced in said Motion, Respondent respectfully shows:

1. Respondent is unopposed to Carvana, LLC's Motion for Relief from Stay.

WHEREFORE, PREMISES CONSIDERED, Respondent prays for the relief requested and for such other and further relief as the Court may deem just and appropriate.

Dated: October 12, 2020.

Respectfully Submitted,

ALLMAND LAW FIRM, P.L.L.C.

/s/ Nicholas Inman Nicholas Inman State Bar No. 00787747 ALLMAND LAW FIRM, P.L.L.C. 860 Airport Freeway, Suite 401 Hurst, TX 76054 214.265.0123 Phone 214.265.1979 Fax

ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 13, 2020, a true and correct copy of the foregoing *Unopposed Response to Motion For Relief From Stay* was served on the following parties in interest by first class mail:

TRUSTEE

Carey D. Ebert Standing Chapter 13 Trustee PO Box 941166 Plano, TX 75094-1166

U.S. TRUSTEE

Office of the U.S. Trustee 110 N. College Ave. Suite 300 Tyler, TX 75702

DEBTOR

Kimbra Renee Currie 2050 FM 423 #502 Little Elm, TX 75068

OPPOSING COUNSEL

GHIDOTTI BERGER, LLP 600 E. John Carpenter Fwy., Ste. 175 Irving, TX 75062

> By: <u>/s/ Nicholas Inman</u> Nicholas Inman State Bar No. 00787747 ATTORNEY FOR DEBTOR